BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF INVESTIGATION INTO QWEST CORPORATION'S COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS.

RUÇO'S APPLICATION TO INTERVENE

I.

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUÇO") hereby applies to the Arizona Corporation Commission ("Commission") for an Order granting it leave to intervene in the above-captioned proceeding.

II.

RUÇO was established by the enactment of Arizona Revised Statutes, Section 40-461, et seq., for the purpose of representing residential utility consumers in matters before the Commission concerning regulated public service corporations.

III.

Arizona Revised Statutes, Section 40-464.A.2., specifically provides that the Director of RUÇO may do the following:

Prepare and present briefs, arguments, proposed rates or orders and intervene or appear on behalf of residential utility consumers before hearing officers and the Corporation Commission as a party in interest and also participate as a party in interest pursuant to
Section 40-254 in proceedings relating to rate making or rate design and involving public service corporations.

IV.

The residential utility consumers of Qwest Corporation will be directly and substantially affected by a Decision or Order of the Commission in this matter, therefore, it is necessary and proper that RU CO intervene in the proceeding.

V.

In order to fulfill its statutory obligation to protect the residential utility consumers of this State, RU CO must thoroughly examine the materials presented by the Company, and must cross-examine witnesses appearing on behalf of the Company and any other parties. Additionally, RU CO may present testimony and exhibits of its own in any hearings conducted by the Commission in this matter.

VI.

The name, mailing address, and telephone number of the person upon whom service of all documents is to be made is,

Scott S. Wakefield, Chief Counsel  
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(602) 279-5659 ext. 349

RESPECTFULLY SUBMITTED this 30th day of August, 2000.

Scott S. Wakefield  
Chief Counsel
AN ORIGINAL AND TEN COPIES of the foregoing filed this 30th day of August, 2000 with:

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COPIES of the foregoing hand delivered/mailed this 30th day of August, 2000 to:

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